



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

Mail Stop 3730

March 1, 2006

**VIA U.S. MAIL AND FAX (805) 690-4200**

Mr. C. Stephen Cordial  
Chief Financial Officer  
CallWave Inc.  
136 West Canon Perdido Street Suite A  
Santa Barbara, CA 93101

**Re: CallWave Inc.**  
**File No. 0-50958**  
**Form 10-K for Fiscal Year Ended June 30, 2005**  
**Filed September 15, 2005**  
**Form 10-Q for the Quarter Ended September 30, 2005**  
**Filed November 15, 2005**

Dear Mr. Cordial:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Larry Spigel  
Assistant Director